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PREVENTION, PESTICIDES AND
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Mr. John J. Wrubel
American Cyanamid Company
P.O. Box 400
Princeton, NJ 08543-0400

Dear Mr. Wrubel:

Enclosed please find draft reregistration chapters for phorate. These chapters were prepared by HED and EFED last year, but because we knew that they would be revised according to the requirements of FQPA, the comments of the SAP on ecological risk assessment, and other developments, I did not transmit them at the time. I have now been instructed to send them to you, but I wish to acknowledge two of the more significant topics from the HED chapter, not directly related to the demands of FQPA, which may be differently addressed in the revised chapter:

Rationale for requiring acute and subchronic/reproductive-developmental neurotoxicity testing

It is suggested such testing be required to correct deficiencies in the phorate database, but reviews are outstanding for relevant NACA and American Cyanamid protocols submitted in 1993. I have requested that HED supply reviews of the protocols or otherwise explain this issue.

Occupational risk

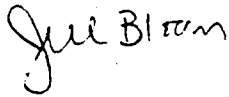
HED/OREB has been informed that no greenhouse/nursery uses are registered for phorate. In addition, I have opened discussions with OREB on how current PPE/closed system factors were incorporated into the assessment, and the process by which risk mitigation options will be developed.



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In addition to these health effects issues, the Science Divisions have been asked to determine whether revisions are needed in response to an updated LUIS report. If you have any questions or comments, feel free to call me at (703) 308-8019.

Sincerely,



Jill Bloom, Chemical Review Manager
Reregistration Branch II
Special Review and Reregistration Division (7508W)
Office of Pesticide Programs

Enclosures (by email to Mr. Wrubel)

cc: Mr. Anthony Baldi, Aceto Agricultural Chemicals Corporation (via regular mail)